

# Exhibit 12 Part 19

## Part 10 of Attachment L to the Allocation Recommendation Report (ARR2846-ARR2872)

United States' Motion to Enter Consent Decree,  
*United States v. Alden Leeds, Inc. et al.*, Civil Action No. 22-7326 (D.N.J.)

Allocation Facility Cmass Calculation

Teval/Guyon	900 and 1000 4th Street	Harrison	NJ	07029
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Constituent Of Concern (COC)	Overland, Fate & Transport C%	Dmass Overland, Fate & Transport	PrePVSC C%	Dmass PrePVSC	PVSC C%	Dmass PVSC	Direct Discharge C%	Dmass Direct Discharge	COC Total Pathway Cmass	COC A%	COC Historic CMass
Copper	100.00%	170.86	100.00%	-	0.00%	1,399.39	100.00%	-	170.86	1.018817E-2	1.74
Lead	100.00%	1,467.3	100.00%	-	0.00%	19,900.57	100.00%	-	1,467.3	1.018817E-2	14.95
Mercury	100.00%	4.03	100.00%	-	0.00%	0.04	100.00%	-	4.03	1.018817E-2	0.04
HPAHs	100.00%	-	100.00%	-	0.00%	0.08	100.00%	1.2	1.21	1.018817E-2	0.01
LPAHs	100.00%	-	100.00%	-	0.00%	0.10	100.00%	0.8	0.81	1.018817E-2	0.01
PCBs	100.00%	19.77	100.00%	-	0.00%	-	100.00%	-	19.77	1.018817E-2	0.2
DDx	100.00%	-	100.00%	-	0.00%	-	100.00%	-	0	1.018817E-2	0
Dieldrin	100.00%	-	100.00%	-	0.00%	-	100.00%	-	0	1.018817E-2	0
Dioxins_Furans	100.00%	-	100.00%	-	0.00%	-	100.00%	-	0	1.018817E-2	0

Constituent Of Concern (COC)	Relative Risk Number (RRN)	Total Mass (Tmass)	COC Historic CMass	COC Relative Contribution	COC Base Score
Copper	0.69	2,100,000.00	1.74	8.289E-7	5.720E-7
Lead	0.01	3,200,000.00	14.95	4.672E-6	4.672E-8
Mercury	0.95	42,000.00	0.04	9.776E-7	9.287E-7
HPAHs	0.05	240,000.00	0.01	5.147E-8	2.573E-9
LPAHs	0.01	170,000.00	0.01	4.844E-8	4.844E-10
PCBs	12.87	26,000.00	0.2	7.747E-6	9.970E-5
DDx	1.37	27,000.00	0	0	0
Dieldrin	0.13	390.00	0	0	0
Dioxins_Furans	83.92	38.00	0	0	0

Allocation Facility COC Base Scores - Alternative Calulcation

Teval/Guyon	900 and 1000 4th Street	Harrison	NJ	07029
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Constituent Of Concern (COC)	Relative Risk Number (RRN)	Total Mass (Tmass)	Total Cmass (TCmass)	Total OS COC ACmass	COC %	COC Historic CMass	Facility OS COC Cmass	COC Relative Responsibility	COC Base Score
Copper	0.69	2,100,000.00	276,960.25	2,097,178.28	6.169E-4	1.74	1,293.77	6.169E-4	4.257E-4
Lead	0.01	3,200,000.00	288,577.67	3,197,059.92	5.085E-3	14.95	16,255.75	5.085E-3	5.085E-5
Mercury	0.95	42,000.00	4,322.53	41,955.96	9.323E-4	0.04	39.12	9.323E-4	8.857E-4
HPAHs	0.05	240,000.00	4,346,388.50	195,718.24	2.789E-7	0.01	0.05	2.789E-7	1.395E-8
LPAHs	0.01	170,000.00	3,012,835.14	139,304.72	2.683E-7	0.01	0.04	2.683E-7	2.683E-9
PCBs	12.87	26,000.00	20,066.54	25,795.56	9.852E-4	0.2	25.41	9.852E-4	1.268E-2
DDx	1.37	27,000.00	2,516.93	26,974.36	0	0	0	0	0
Dieldrin	0.13	390.00	1.27	389.99	0	0	0	0	0
Dioxins_Furans	83.92	38.00	3,729.82	0.00	0	0	0	0	0

Facility Bypass Information

Teval/Guyon	900 and 1000 4th Street	Harrison	NJ	07029
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Item	Bypass Name	Bypass Type	Time %	Flow %	Bypass Notes
1	Newark Bay	Bypass	0.00%	0.00%	Did not discharge waste into the Passaic river

Discharge Calcs	POTW Discharge Information	COMMENTS/NOTES
	gal discharged per day/week/month	Cutting, Welding and Shaping of Piping
	# hours/per day discharged	Office Space
	#days/week discharged	No other information provided
	#weeks/yr discharged	Estimating based on Revere Smelting Operations
2,600,000	calc gal/yr discharge	
1947	Yr Ops started	
1992	Yr Ops ceased	
45	calc #yrs facility operated	
Copper (Cu)		
45	#yrs facility discharged	Based on Revere Smelting at 20% due to operational differences
3.16	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
1,399.39	calc kg COC discharged	
Lead (Pb)		
45	#yrs facility discharged	Based on Revere Smelting at 20% due to operational differences
44.94	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
19,900.57	calc kg COC discharged	
Mercury (Hg)		
45	#yrs facility discharged	Based on Revere Smelting at 20% due to operational differences
0.000098	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
0.043	calc kg COC discharged	
HPAHs		
45	#yrs facility discharged	Based on Revere Smelting at 20% due to operational differences
	calc mg/L O&G	
10%	% O&G that is considered PAHs	
60%	% COC in O&G considered as PAHs	
0.0009	calc mg/L HPAHs	
0.757	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
0.08	calc kg COC discharged	
LPAHs		
45	#yrs facility discharged	Based on Revere Smelting at 20% due to operational differences
	calc mg/L O&G	
10%	% O&G that is considered PAHs	
40%	% COC in O&G considered as PAHs	
0.0011	calc mg/L LPAHs	
0.757	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
0.10	calc kg COC discharged	
PCBs		
31	#yrs facility discharged within PCBs Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
DDx		
26	#yrs facility discharged within DDx Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Dieldrin		
38	#yrs facility discharged within Dieldrin Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Dioxins/Furans		
45	#yrs facility discharged	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Dioxin/Furan Precursor - 2,4-D		
46	#yrs facility discharged within 2,4-D Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Dioxin/Furan Precursor - 2,4,5-T		
39	#yrs facility discharged within 2,4,5-T Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Dioxin/Furan Precursor - 2,4,6-TCP		
26	#yrs facility discharged within 2,4,6-TCP Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Summary DMassCOC for POTW:		
1,399.39	kg Copper	
19,900.57	kg Lead	
0.04	kg Mercury	
0.08	kg HPAHs	
0.10	kg LPAHs	
-	kg PCBs	
-	kg DDx	
-	kg Dieldrin	
-	kg Dioxins/Furans	

Discharge Calcs	Direct Discharge Information	COMMENTS/NOTES
	# hours/day discharged	
	# days/week discharged	Stormwater Discharge direct to Passaic River from 1969-1971 PAS00076889
	# weeks/yr discharged	Oily Discharge
22,620,973	# gals/yr directly discharged	
4.08	ft: 30yr average annual precipitation per Rutgers information	
	acres	
43,560	ft2 per acre	
34.00	acres	
50%	Percent Precip to River	
1969	Yr Ops started	
1971	Yr Ops ceased	
2	calc #yrs facility operated	
Copper (Cu)		
2	#yrs facility discharged	
	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Lead (Pb)		
2	#yrs facility discharged	
	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Mercury (Hg)		
2	#yrs facility discharged	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
HPAHs		
2	#yrs facility discharged	
0.12	calc mg/L O&G	
10%	% O&G that is considered PAHs	
60%	% PAHs considered as HPAHs	
0.0071	calc mg/L HPAHs	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
1.21	calc kg COC discharged	
LPAHs		
2	#yrs facility discharged	
0.12	calc mg/L O&G	
10%	% O&G that is considered PAHs	
40%	% PAHs considered as LPAHs	
0.0047	calc mg/L LPAHs	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
0.81	calc kg COC discharged	
PCBs		
3	#yrs facility discharged within PCBs Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
DDx		
3	#yrs facility discharged within DDx Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Dieldrin		
3	#yrs facility discharged within Dieldrin Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Dioxins/Furans		
2	#yrs facility discharged	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Dioxin/Furan Precursor - 2,4-D		
3	#yrs facility discharged within 2,4-D Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Dioxin/Furan Precursor - 2,4,5-T		
3	#yrs facility discharged within 2,4,5-T Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Dioxin/Furan Precursor - 2,4,6-TCP		
3	#yrs facility discharged within 2,4,6-TCP Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Summary DMassCOC for Direct Discharge:		
-	kg Copper	
-	kg Lead	
-	kg Mercury	
1.21	kg HPAHs	
0.81	kg LPAHs	
-	kg PCBs	
-	kg DDx	
-	kg Dieldrin	
-	kg Dioxins/Furans	

Discharge Calcs	Direct Discharge Information	ASSUMPTIONS, REFERENCES	COMMENTS/NOTES
	4.08 FEET/YEAR AVERAGE PRECIPITATION	Long term average annual precipitation includes floods and hurricane events occurring over time.	Data from Rutgers University.
	35.651 ACRES - TOTAL SITE AREA (acres)	FDR p 1	
	8.91 ACRES - AFFECTED AREA	Looks to be around 75% buildings in 1977 aerial photos here <a href="https://njdep.maps.arcgis.com/apps/webappviewer/index.html">https://njdep.maps.arcgis.com/apps/webappviewer/index.html</a>	
	4,046.86 METERS <sup>2</sup> /ACRE		
	36,069 METERS <sup>2</sup> (AFFECTED AREA)		
	0.0001 METERS/YEAR (ERODED SOIL THICKNESS)	For this estimate, used a surface soil erosion rate of 0.1 mm/year, or 0.004 inches/year.	
	4 METERS <sup>3</sup> /YEAR (ERODED SOIL VOLUME)	VOLUME/YEAR DISCHARGED TO DITCHES	
	1947 Year Teval operations began 2006 Year Teval sold the property	FDR p 1 Teval operations ceased in 1992 (FDR p 1)	
	59 NUMBER YEARS DISCHARGE		
	213 METERS <sup>3</sup> (TOTAL SOIL VOLUME DISCHARGED OVER TIME)		
	1,859 KG/M <sup>3</sup> SOIL DENSITY	Reported as historic fill on site, so use soil composition as other historic fill sites. Bulk density range 1346 KG/M <sup>3</sup> to 2371 KG/M <sup>3</sup> , so use average. ( <a href="http://structx.com/Soil_Properties_002.html">http://structx.com/Soil_Properties_002.html</a> )	
	395,498 KILOGRAMS (TOTAL SOIL DISCHARGED OVER TIME)		
Copper (Cu)	59 YEARS DISCHARGED 432 MG/KG (MAX CONCENTRATION) 0.000001 kg per mg (Merck Index)	This site is located on regional historic fill (FDR p 163) Copper used to make pipes on site (FDR p 3)	
	171 KILOGRAMS DISCHARGED	Max concentration at sample S-202 (depth unknown) (PAS-00000980)	
Lead (Pb)	59 YEARS DISCHARGED 3710 MG/KG (MAX CONCENTRATION) 0.000001 kg per mg (Merck Index)	Lead paint, primer, and primer paint stored on site (FDR p 6)	
	1,467 KILOGRAMS DISCHARGED	Max concentration at sample S-202 (depth unknown) (PAS-00000980)	
Mercury (Hg)	59 YEARS DISCHARGED 10.2 MG/KG (MAX CONCENTRATION) 0.000001 kg per mg (Merck Index)	Mercury released and detected in soil (FDR 8)	
	4 KILOGRAMS DISCHARGED	Max concentration at sample S-203 (depth unknown) (PAS-00000981)	
PAHs (listed in Benzo(a)pyrene Equivalent conversion table)	59 YEARS DISCHARGED 0.0 MG/KG (TOTAL PAH AVERAGE CONCENTRATION) 0.000001 kg per mg (Merck Index)	No soil data available for PAHs	
	0 KILOGRAMS DISCHARGED		
PAHs (others detected)	59 YEARS DISCHARGED 0.000001 kg per mg (Merck Index)		
	0 KILOGRAMS DISCHARGED		

Contaminant	Concentration (mg/kg)	Toxic Equivalency	Benzo(a)pyrene Equivalents
Benzo(a)pyrene	0.00	1.0	0.0000
Benzo(a)anthracene	0.00	0.1	0.0000
Benzo(b)fluoranthene	0.00	0.1	0.0000
Benzo(k)fluoranthene	0.00	0.01	0.0000
Chrysene	0.00	0.001	0.0000
Dibenz(a,h)anthracene	0.00	1.0	0.0000
Indeno(1,2,3-cd)pyrene	0.00	0.1	0.0000
DE Residential = 0.1 mg/kg; DE Industrial = 0.7 mg/kg Total Benzo(a)pyrene Equivalents =			0.0



PCBs	59 YEARS DISCHARGED 50 MG/KG	PCB transformers on site (FDR p 8)
	0.000001 kg per mg (Merck Index)	
	20 KILOGRAMS DISCHARGED	
DDx	59 YEARS DISCHARGED within DDx Timeline MG/KG (MAX CONCENTRATION)	
	3.785 L per gallon (Merck Index)	
	0.000001 kg per mg (Merck Index)	
	0 KILOGRAMS DISCHARGED	
Dieldrin	59 YEARS DISCHARGED within Dieldrin Timeline MG/KG (MAX CONCENTRATION)	
	3.785 L per gallon (Merck Index)	
	0.000001 kg per mg (Merck Index)	
	0 KILOGRAMS DISCHARGED	
Dioxins/Furans	NONE FOUND IN AVAILABLE DOCUMENTATION	
	59 YEARS DISCHARGED MG/KG (MAX CONCENTRATION)	
	0.000001 kg per mg (Merck Index)	
	0 calc kg COC discharged	
SUMMARY CMASS ESTIMATES:		
	170.86 kg Copper	
	1,467.30 kg Lead	
	4.03 kg Mercury	
	0.00 kg PAHs (Benzo(a)pyrene Equivalent)	
	0.00 kg PAHs (Other)	
	19.77 kg PCBs	
	0.00 kg DDx	
	0.00 kg Dieldrin	
	0.00 kg Dioxins/Furans	
	1661.96 MASS (KG) DISCHARGED FROM SURFACE SOIL	

Teval/Guyon

900 and 1000 4th Street	Harrison	NJ	07029
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Facility BS	CUF	CUF_Category	CUF_NOTES	COF	COF_NOTES	Facillty Adjusted BS
1.013E-4	0.0%	Historically Compliant or No Evidence	Sandblasting waste was stored on the ground just north of Building G-16. Periodically, it would be scooped up and put in a dumpster and then trucked offsite to a disposal facility in Pennsylvania (PAP-00190195). There were several areas with stained soil. No information on NOVs was identified in the available file material.	0.0%	0% Cooperation with conduct of allocation and requests for related information	1.013E-4

AP_ABS	1.013E-4
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Teval/Guyon

900 and 1000 4th Street	Harrison	NJ	07029
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Facility BS	CUF	CUF_Category	CUF_NOTES	COF	COF_NOTES	Facillty Adjusted BS
1.404E-2	0.0%	Historically Compliant or No Evidence	Sandblasting waste was stored on the ground just north of Building G-16. Periodically, it would be scooped up and put in a dumpster and then trucked offsite to a disposal facility in Pennsylvania (PAP-00190195). There were several areas with stained soil. No information on NOVs was identified in the available file material.	0.0%	0% Cooperation with conduct of allocation and requests for related information	1.404E-2

AP_ABS	1.404E-2
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Allocation Facility Cmass Calculation

Textron Inc.	681 Main Street	Belleville	NJ	07109
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Constituent Of Concern (COC)	Overland, Fate & Transport C%	Dmass Overland, Fate & Transport	PrePVSC C%	Dmass PrePVSC	PVSC C%	Dmass PVSC	Direct Discharge C%	Dmass Direct Discharge	COC Total Pathway Cmass	COC A%	COC Historic CMass
Copper	100.00%	-	100.00%	-	12.41%	-	100.00%	-	0	1.018817E-2	0
Lead	100.00%	-	100.00%	-	12.41%	38.10	100.00%	-	4.73	1.018817E-2	0.05
Mercury	100.00%	-	100.00%	-	12.41%	76.20	100.00%	-	9.46	1.018817E-2	0.1
HPAHs	100.00%	0.01	100.00%	-	12.41%	19.81	100.00%	-	2.47	1.018817E-2	0.03
LPAHs	100.00%	-	100.00%	-	12.41%	81.27	100.00%	-	10.09	1.018817E-2	0.1
PCBs	100.00%	-	100.00%	-	12.41%	-	100.00%	-	0	1.018817E-2	0
DDx	100.00%	-	100.00%	-	12.41%	-	100.00%	-	0	1.018817E-2	0
Dieldrin	100.00%	-	100.00%	-	12.41%	-	100.00%	-	0	1.018817E-2	0
Dioxins_Furans	100.00%	-	100.00%	-	12.41%	-	100.00%	-	0	1.018817E-2	0

Textron Inc.

681 Main Street

Belleville

NJ

07109

Constituent Of Concern (COC)	Relative Risk Number (RRN)	Total Mass (Tmass)	COC Historic CMass	COC Relative Contribution	COC Base Score
Copper	0.69	2,100,000.00	0	0	0
Lead	0.01	3,200,000.00	0.05	1.505E-8	1.505E-10
Mercury	0.95	42,000.00	0.1	2.294E-6	2.179E-6
HPAHs	0.05	240,000.00	0.03	1.048E-7	5.238E-9
LPAHs	0.01	170,000.00	0.1	6.045E-7	6.045E-9
PCBs	12.87	26,000.00	0	0	0
DDx	1.37	27,000.00	0	0	0
Dieldrin	0.13	390.00	0	0	0
Dioxins_Furans	83.92	38.00	0	0	0

Allocation Facility COC Base Scores - Alternative Calulcation

Textron Inc.	681 Main Street	Belleville	NJ	07109
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Constituent Of Concern (COC)	Relative Risk Number (RRN)	Total Mass (Tmass)	Total Cmass (TCmass)	Total OS COC ACmass	COC %	COC Historic CMass	Facility OS COC Cmass	COC Relative Responsibility	COC Base Score
Copper	0.69	2,100,000.00	276,960.25	2,097,178.28	0	0	0	0	0
Lead	0.01	3,200,000.00	288,577.67	3,197,059.92	1.639E-5	0.05	52.39	1.639E-5	1.639E-7
Mercury	0.95	42,000.00	4,322.53	41,955.96	2.188E-3	0.1	91.79	2.188E-3	2.078E-3
HPAHs	0.05	240,000.00	4,346,388.50	195,718.24	5.678E-7	0.03	0.11	5.678E-7	2.839E-8
LPAHs	0.01	170,000.00	3,012,835.14	139,304.72	3.348E-6	0.1	0.47	3.348E-6	3.348E-8
PCBs	12.87	26,000.00	20,066.54	25,795.56	0	0	0	0	0
DDx	1.37	27,000.00	2,516.93	26,974.36	0	0	0	0	0
Dieldrin	0.13	390.00	1.27	389.99	0	0	0	0	0
Dioxins_Furans	83.92	38.00	3,729.82	0.00	0	0	0	0	0

Facility Bypass Information

Textron Inc.	681 Main Street	Belleville	NJ	07109
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Item	Bypass Name	Bypass Type	Time %	Flow %	Bypass Notes
1	Union Outlet	Bypass	12.41%	100.00%	

Discharge Calcs	POTW Discharge Information	COMMENTS/NOTES
	gal discharged per day/week/month	Artificial Leather and Plastics Manufacturing
	# hours/per day discharged	Discharged to sanitary sewer after 1926 - PVSC
	#days/week discharged	Estimation based on BASF Corporation - manufacturer of plasticizers
	#weeks/yr discharged	assumed flow volumes to be 50% of BASF
16,777,800	calc gal/yr discharge	PAS-00054098
1956	Yr Ops started	
1962	Yr Ops ceased	
6	calc #yrs facility operated	FDR page 1
Copper (Cu)		
6	#yrs facility discharged	
	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Lead (Pb)		
6	#yrs facility discharged	Based on BASF Corporation
0.10	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
38.10	calc kg COC discharged	
Mercury (Hg)		
6	#yrs facility discharged	Based on BASF Corporation
0.2000	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
76.20	calc kg COC discharged	
HPAHs		
6	#yrs facility discharged	Based on BASF Corporation
	calc mg/L O&G	
10%	% O&G that is considered PAHs	
60%	% COC in O&G considered as PAHs	
0.0520	calc mg/L HPAHs	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
19.81	calc kg COC discharged	
LPAHs		
6	#yrs facility discharged	Based on BASF Corporation
	calc mg/L O&G	
10%	% O&G that is considered PAHs	
40%	% COC in O&G considered as PAHs	
0.2133	calc mg/L LPAHs	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
81.27	calc kg COC discharged	
PCBs		
7	#yrs facility discharged within PCBs Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
DDx		
7	#yrs facility discharged within DDx Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Dieldrin		
7	#yrs facility discharged within Dieldrin Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Dioxins/Furans		
6	#yrs facility discharged	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Dioxin/Furan Precursor - 2,4-D		
7	#yrs facility discharged within 2,4-D Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Dioxin/Furan Precursor - 2,4,5-T		
7	#yrs facility discharged within 2,4,5-T Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Dioxin/Furan Precursor - 2,4,6-TCP		
7	#yrs facility discharged within 2,4,6-TCP Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Summary DMassCOC for POTW:		
-	kg Copper	
38.10	kg Lead	
76.20	kg Mercury	
19.81	kg HPAHs	
81.27	kg LPAHs	
-	kg PCBs	
-	kg DDx	
-	kg Dieldrin	
-	kg Dioxins/Furans	



Discharge Calcs	Direct Discharge Information	ASSUMPTIONS, REFERENCES	COMMENTS/NOTES
	4.08 FEET/YEAR AVERAGE PRECIPITATION	Long term average annual precipitation includes floods and hurricane events occurring over time.	Data from Rutgers University.
	15 ACRES - TOTAL SITE AREA (acres) 4 ACRES - AFFECTED AREA	FDR p 1 Rough estimate of site area with exposed fill determined from review of PAP-00445807. Estimating that 75% of the site had buildings	Aerial photos 1977 to 2020 show that lot has been paved since 1977 (Google Earth Pro and <a href="https://njdep.maps.arcgis.com/apps/webappviewer/index.html">https://njdep.maps.arcgis.com/apps/webappviewer/index.html</a> ).
	4,046.86 METERS <sup>2</sup> /ACRE		
	15,176 METERS <sup>2</sup> (AFFECTED AREA)		
	0.0001 METERS/YEAR (ERODED SOIL THICKNESS)	For this estimate, used a surface soil erosion rate of 0.1 mm/year, or 0.004 inches/year.	
	2 METERS <sup>2</sup> /YEAR (ERODED SOIL VOLUME)	VOLUME/YEAR DISCHARGED	
	1956 Year site operations began	Textron purchased the assets of Federal Leather Co (which had been operating on site since 1919) excluding any obligations or liabilities (FDR p 1)	
	1962 Year site processing and storage operations ceased	Textron sold the assests to Air Reduction Co (FDR p 1)	Cumberland Chemical Co owned from 1962 to 1966. Belleville Industrial Center owned and operated at the site starting 1968. Helion Industries was tenant from 1975 to 2001 (FDR p 1)
	6 NUMBER YEARS DISCHARGE		
	9 METERS <sup>3</sup> (TOTAL SOIL VOLUME DISCHARGED OVER TIME)		
	1,963 KG/M <sup>3</sup> SOIL DENSITY	Surface soil is fill consisting of medium to coarse sand, with medium gravel (PAS-00102979). Density of silty sand and gravel ranges from 1442 to 2483 kg/m <sup>3</sup> , so the average is used. ( <a href="http://structx.com/Soil_Properties_002.html">http://structx.com/Soil_Properties_002.html</a> )	
	17,869 KILOGRAMS (TOTAL SOIL DISCHARGED OVER TIME)		
Copper (Cu)	6 YEARS DISCHARGED 0 MG/KG (MAX CONCENTRATION)	Site is located on regional Historic Fill (FDR p 5) No info regarding storage or use of copper on site (FDR p 1-2)	
	0.000001 kg per mg (Merck Index) 0 KILOGRAMS DISCHARGED	990 mg/kg Max concentration from Sample 18 (0.5-1 ft bgs) (PAS-00102988, 3002). Set to 0 since less than HF.	
Lead (Pb)	6 YEARS DISCHARGED 0 MG/KG (AVERAGE CONCENTRATION)	No info regarding storage or use of lead on site (FDR p 1-2)	
	0.000001 kg per mg (Merck Index) 0 KILOGRAMS DISCHARGED	280 mg/kg Max concentration from Sample 18 (0.5-1 ft bgs) (PAS-00103002). Set to 0 since less than HF.	
Mercury (Hg)	6 YEARS DISCHARGED 0.0 MG/KG (MAX CONCENTRATION)	No info regarding storage or use of mercury on site (FDR p 1-2)	
	0.000001 kg per mg (Merck Index) 0 KILOGRAMS DISCHARGED	0.46 mg/kg Max concentration from Sample 18 (0.5-1 ft bgs) (PAS-00103002). Set to 0 since less than HF.	
PAHs (listed in Benzo(a)pyrene Equivalent conversion table)	6 YEARS DISCHARGED 0.049 MG/KG (TOTAL PAH AVERAGE CONCENTRATION)	Total concentration of PAH compounds for Benzo(a)pyrene Equivalent <a href="https://floridadep.gov/waste/petroleum-restoration/documents/benzo-pyrene-equivalents-conversion-table-one-sample">https://floridadep.gov/waste/petroleum-restoration/documents/benzo-pyrene-equivalents-conversion-table-one-sample</a> .	
	0.000001 kg per mg (Merck Index) 0 KILOGRAMS DISCHARGED	No info regarding storage or use of PAHs on site (FDR p 1-2)	
PAHs (others detected)	6 YEARS DISCHARGED 0.088 MG/KG (TOTAL PAH MAX CONCENTRATION)	Data below the Benzo(a)pyrene Equivalent Table	
	0.000001 kg per mg (Merck Index) 0 KILOGRAMS DISCHARGED		
PCBs	6 YEARS DISCHARGED 0 MG/KG (MAX OF REPORTED CONCENTRATIONS)	PCB concentration (0 mg/kg) based on sample 11B, ND at MDL (PAS-00102997)	
	0.000001 kg per mg (Merck Index) 0 KILOGRAMS DISCHARGED		
DDx	0 YEARS DISCHARGED within DDx Timeline 0.941 MG/KG (MAX CONCENTRATION) 3.785 L per gallon (Merck Index) 0.000001 kg per mg (Merck Index) 0 KILOGRAMS DISCHARGED	Sum of DDD, DDE, and DDT results from Sample 18 (PAS-00103002)	

Contaminant	Concentration (mg/kg)	Toxic Equivalency Factor	Benzo(a)pyrene Equivalents
Benzo(a)pyrene	0.039	1.0	0.0390
Benzo(a)anthracene	0.044	0.1	0.0044
Benzo(b)fluoranthene	0.053	0.1	0.0053
Benzo(k)fluoranthene	0.000	0.01	0.0000
Chrysene	0.041	0.001	0.0000
Dibenz(a,h)anthracene	0.000	1.0	0.0000
Indeno(1,2,3-cd)pyrene	0.000	0.1	0.0000
DE Residential = 0.1 mg/kg; DE Industrial = 0.7 mg/kg			
Total Benzo(a)pyrene Equivalents =			0.049

PAH values changed to sample 11B (PAS-00102995-6)	
Anthracene	0
Acenaphthene	0
Acenaphthylene	0
Fluorene	0
Naphthalene	0
Phenanthrene	0.088
1-methylnaphthalene	0
2-methylnaphthalene	0
SUM	0.088

Dieldrin	0 YEARS DISCHARGED within Dieldrin Timeline
	0 MG/KG (MAX CONCENTRATION)
	3.785 L per gallon (Merck Index)
	0.000001 kg per mg (Merck Index)
	0 KILOGRAMS DISCHARGED
Dioxins/Furans	NONE FOUND IN AVAILABLE DOCUMENTATION
	0 YEARS DISCHARGED
	0 MG/KG (MAX CONCENTRATION)
	0.000001 kg per mg (Merck Index)
	0 calc kg COC discharged
SUMMARY CMASS ESTIMATES:	
	0.00 kg Copper
	0.00 kg Lead
	0.00 kg Mercury
	0.0009 kg PAHs (Benzo(a)pyrene Equivalent)
	0.0016 kg PAHs (Other)
	0.00 kg PCBs
	0.00 kg DDx
	0.00 kg Dieldrin
	0.00 kg Dioxins/Furans
0.00 MASS (KG) DISCHARGED FROM SURFACE SOIL	

**Textron Inc.**

## Belleville

07109

Facility BS	CUF	CUF_Category	CUF_NOTES	COF	COF_NOTES	Facility Adjusted BS
2.191E-6	0.0%	Historically Compliant or No Evidence	Captain Vicari of the Belleville Fire Department stated that he was aware of a number of fires at the facility during the 1960s. Captain Vicari also stated that methyl ethyl ketone was dumped by employees who used the substance to wash parts. Spills and fires were also noted in the 1980s. It was stated that violation notices were issued to the facility by the Fire Department (PAS-00103080). Unable to determine if fires and spills cited occurred during Texaco period of ownership which ended in 1962.	-10.0%	-10% CPG member - Participation in PRP Group action to cooperate with governmental/regulatory entities to address environmental or public harm created by own activities	1.972E-6
						1.972E-6

Textron Inc.

681 Main Street	Belleville	NJ	07109
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Facility BS	CUF	CUF_Category	CUF_NOTES	COF	COF_NOTES	Facillty Adjusted BS
2.079E-3	0.0%	Historically Compliant or No Evidence	Captain Vicari of the Belleville Fire Department stated that he was aware of a number of fires at the facility during the 1960s. Captain Vicari also stated that methyl ethyl ketone was dumped by employees who used the substance to wash parts. Spills and fires were also noted in the 1980s. It was stated that violation notices were issued to the facility by the Fire Department (PAS-00103080). Unable to determine if fires and spills cited occurred during Texaco period of ownership which ended in 1962.	-10.0%	-10% CPG member - Participation in PRP Group action to cooperate with governmental/regulatory entities to address environmental or public harm created by own activities	1.871E-3

AP_ABS	1.871E-3
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**Allocator's Determinations Regarding  
Legal Defenses Raised by Allocation Parties**

**TEXTRON**

Textron states that it received a release from Occidental Chemical Corporation ("Occidental") in the Tierra/Maxus bankruptcy and Occidental is not entitled to recover at least \$165 million dollars in response costs from Textron. Any responsibility for such responses costs must be deducted from any share of the OU-2 response costs attributable to Textron.

ALLOCATOR'S DETERMINATION – Though I have not had the opportunity to review the underlying settlement document and other potentially relevant facts associated with the release provided by OCC, assuming its validity, it is apparent that there is a high likelihood of success in any action against OCC to enforce the release. Given OCC's lack of participation in the allocations process, however, the Allocator does not believe that it is appropriate to account for the amount of any such release in the assignment of allocated shares. Rather, the Allocator notes the existence of the release and recommends that it be taken into account in determining the appropriate amount of any future settlement with EPA.

Allocation Facility Cmass Calculation

Tiffany and Company	820 Highland Avenue	Newark	NJ	07104
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Constituent Of Concern (COC)	Overland, Fate & Transport C%	Dmass Overland, Fate & Transport	PrePVSC C%	Dmass PrePVSC	PVSC C%	Dmass PVSC	Direct Discharge C%	Dmass Direct Discharge	COC Total Pathway Cmass	COC A%	COC Historic CMass
Copper	100.00%	-	100.00%	1,420.06	8.23%	3,260.87	100.00%	-	1,688.28	1.018817E-2	17.2
Lead	100.00%	-	100.00%	-	8.23%	-	100.00%	-	0	1.018817E-2	0
Mercury	100.00%	-	100.00%	-	8.23%	-	100.00%	-	0	1.018817E-2	0
HPAHs	100.00%	-	100.00%	8,520.34	8.23%	19,565.23	100.00%	-	10,129.7	1.018817E-2	103.2
LPAHs	100.00%	-	100.00%	5,680.23	8.23%	13,043.49	100.00%	-	6,753.13	1.018817E-2	68.8
PCBs	100.00%	-	100.00%	-	8.23%	-	100.00%	-	0	1.018817E-2	0
DDx	100.00%	-	100.00%	-	8.23%	-	100.00%	-	0	1.018817E-2	0
Dieldrin	100.00%	-	100.00%	-	8.23%	-	100.00%	-	0	1.018817E-2	0
Dioxins_Furans	100.00%	-	100.00%	-	8.23%	-	100.00%	-	0	1.018817E-2	0

Tiffany and Company

820 Highland Avenue

Newark

NJ

07104

Constituent Of Concern (COC)	Relative Risk Number (RRN)	Total Mass (Tmass)	COC Historic CMass	COC Relative Contribution	COC Base Score
Copper	0.69	2,100,000.00	17.2	8.191E-6	5.652E-6
Lead	0.01	3,200,000.00	0	0	0
Mercury	0.95	42,000.00	0	0	0
HPAHs	0.05	240,000.00	103.2	4.300E-4	2.150E-5
LPAHs	0.01	170,000.00	68.8	4.047E-4	4.047E-6
PCBs	12.87	26,000.00	0	0	0
DDx	1.37	27,000.00	0	0	0
Dieldrin	0.13	390.00	0	0	0
Dioxins_Furans	83.92	38.00	0	0	0

Allocation Facility COC Base Scores - Alternative Calulcation

Tiffany and Company	820 Highland Avenue	Newark	NJ	07104
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Constituent Of Concern (COC)	Relative Risk Number (RRN)	Total Mass (Tmass)	Total Cmass (TCmass)	Total OS COC ACmass	COC %	COC Historic CMass	Facility OS COC Cmass	COC Relative Responsibility	COC Base Score
Copper	0.69	2,100,000.00	276,960.25	2,097,178.28	6.096E-3	17.2	12,783.89	6.096E-3	4.206E-3
Lead	0.01	3,200,000.00	288,577.67	3,197,059.92	0	0	0	0	0
Mercury	0.95	42,000.00	4,322.53	41,955.96	0	0	0	0	0
HPAHs	0.05	240,000.00	4,346,388.50	195,718.24	2.331E-3	103.2	456.14	2.331E-3	1.165E-4
LPAHs	0.01	170,000.00	3,012,835.14	139,304.72	2.241E-3	68.8	312.25	2.241E-3	2.241E-5
PCBs	12.87	26,000.00	20,066.54	25,795.56	0	0	0	0	0
DDx	1.37	27,000.00	2,516.93	26,974.36	0	0	0	0	0
Dieldrin	0.13	390.00	1.27	389.99	0	0	0	0	0
Dioxins_Furans	83.92	38.00	3,729.82	0.00	0	0	0	0	0



Facility Bypass Information

Tiffany and Company	820 Highland Avenue	Newark	NJ	07104
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Item	Bypass Name	Bypass Type	Time %	Flow %	Bypass Notes
1	Verona Ave	CSO	1.27%	21.70%	
2	Verona Ave	Bypass	7.95%	100.00%	

Discharge Calcs	POTW Discharge Information	COMMENTS/NOTES
	gal discharged per day/week/month	
	# hours/per day discharged	Sterling Silver Products and Personal Paper Products
5	#days/week discharged	Limited use or production of COCs
52	#weeks/yr discharged	Permit limits for oil and grease
13,895,564	calc gal/yr discharge PAS00109140, PAS00048935, PAS00048880	Copper dies with trace amounts of copper in wastewater
		1972 Waste Effluent Survey for 1971 = 8042496 gallons process water to sanitary sewer
1897	Yr Ops started	1983 Discharge information 4/1-6/31 = 2566203 gallons; 7/1-9/30 1255895 gallons
1986	Yr Ops ceased	1984 100,000 gallons per day to PVSC
89	calc #yrs facility operated	Discharges to PVSC, including overflows from stormwater storage cistern
Copper (Cu)		
89	#yrs facility discharged	
1.00	calc mg/L COC discharged	No discharge data but reference to copper in small quantities in wastewater discharge to PVSC (1mg/l)
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
4,680.93	calc kg COC discharged	
Lead (Pb)		
89	#yrs facility discharged	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Mercury (Hg)		
89	#yrs facility discharged	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
HPAHs		
89	#yrs facility discharged	No discharge data but 1981-86 permit has limit of 100mg/l oil and grease
100.00	calc mg/L O&G	
10%	% O&G that is considered PAHs	
60%	% PAHs considered as HPAHs	
6	calc mg/L HPAHs	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
28,085.58	calc kg COC discharged	
LPAHs		
89	#yrs facility discharged	No discharge data but 1981-86 permit has limit of 100mg/l oil and grease
100.00	calc mg/L O&G	
10%	% O&G that is considered PAHs	
40%	% PAHs considered as LPAHs	
4	calc mg/L LPAHs	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
18,723.72	calc kg COC discharged	
PCBs		
49	#yrs facility discharged within PCBs Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
DDx		
33	#yrs facility discharged within DDx Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Dieldrin		
37	#yrs facility discharged within Dieldrin Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Dioxins/Furans		
89	#yrs facility discharged	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Dioxin/Furan Precursor - 2,4-D		
41	#yrs facility discharged within 2,4-D Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Dioxin/Furan Precursor - 2,4,5-T		
41	#yrs facility discharged within 2,4,5-T Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Dioxin/Furan Precursor - 2,4,6-TCP		
26	#yrs facility discharged within 2,4,6-TCP Timeline	
-	calc mg/L COC discharged	
3.785	L per gallon (Merck Index)	
0.000001	kg per mg (Merck Index)	
-	calc kg COC discharged	
Summary DMassCOC for POTW:		
4,680.93	kg Copper	
-	kg Lead	
-	kg Mercury	
28,085.58	kg HPAHs	
18,723.72	kg LPAHs	
-	kg PCBs	
-	kg DDx	
-	kg Dieldrin	
-	kg Dioxins/Furans	

Tiffany and Company

820 Highland Avenue	Newark	NJ	07104
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Facility BS	CUF	CUF_Category	CUF_NOTES	COF	COF_NOTES	Facillty Adjusted BS
3.120E-5	0.0%	Historically Compliant or No Evidence	No information on violations or sloppy practices was identified in the available file material.	-20.0%	-20% CPG/SPG member - Continuous provision of funding and participation in PRP Group(s) actions to cooperate with governmental/regulatory entities to address environmental or public harm created by own activities	2.496E-5

AP_ABS	2.496E-5
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## Tiffany and Company

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AP_ABS	3.476E-3
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